

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

GILBERT JAMES, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

EXPERIAN INFORMATION
SOLUTIONS, INC.,

Defendant.

:
:
:
:
:
:
:
:
:
:
:
:
:

Civil Action No. 3:12cv902

JOINT MOTION TO TEMPORARILY STAY PRETRIAL DEADLINES

COME NOW the Parties, by counsel, and move the Court for an order granting a temporary stay of pretrial deadlines until February 18, 2014 in the above-captioned matter. The grounds for this motion are set forth in the Parties' contemporaneously filed supporting memorandum of law.

Respectfully submitted,
PLAINTIFFS,
*individually and on behalf of all
others similarly situated*

/s/ Janelle Mason Mikac
Matthew J. Erausquin (VA Bar No. 65434)
Janelle Mason Mikac (VA Bar No. 82389)
Casey S. Nash (VA Bar No. 84261)
CONSUMER LITIGATION ASSOCIATES, P.C.
1800 Diagonal Road, Suite 600
Alexandria, VA 22314
Telephone: 703.273.7770
Facsimile: 888.892.3512
Email: matt@clalegal.com
Email: janelle@clalegal.com
Email: casey@clalegal.com

Leonard A. Bennett (VA Bar No. 37523)
CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Blvd., Suite 1-A
Newport News, VA 23601
Telephone: 757.930.3660
Facsimile: 757.930.3662
Email: lenbennett@clalegal.com

Respectfully submitted,
**EXPERIAN INFORMATION SOLUTIONS,
INC.,**

/s/ Joseph W. Clark _____
Joseph W. Clark (VA Bar No. 42664)
Edward M. Wenger (admitted pro hac vice)
Counsel for the Defendant
JONES DAY
51 Louisiana Avenue, N.W.
Washington, DC 20001-2113
Telephone: (202) 879-3939
Facsimile: (202) 626-1700
Email: jwclark@jonesday.com
Email: emwenger@jonesday.com

Daniel J. McLoon (admitted pro hac vice)
Counsel for the Defendant
JONES DAY
555 South Flower Street, Fiftieth Floor
Los Angeles, CA 90071
Telephone: (213) 243-2580
Facsimile: (213) 243-2539
E-mail: djmcloon@jonesday.com

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of January, 2014, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Daniel J. McLoon (*admitted pro hac vice*)

JONES DAY

555 South Flower Street, Fiftieth Floor

Los Angeles, CA 90071

Telephone: (213) 243-2580

Facsimile: (213) 243-2539

Email: djmcloon@jonesday.com

Joseph W. Clark

Edward M. Wenger (*admitted pro hac vice*)

JONES DAY

51 Louisiana Avenue, N.W.

Washington, DC 20001-2113

Telephone: (202) 879-3939

Facsimile: (202) 626-1700

Email: jwclark@jonesday.com

Email: emwenger@jonesday.com

Counsel for the Defendants

/s/

Janelle Mason Mikac, VSB No. 82389

Counsel for the Plaintiffs

CONSUMER LITIGATION ASSOCIATES, P.C.

1800 Diagonal Road, Suite 600

Alexandria, VA 22314

Tel: (703) 273-7770

Fax: (888) 892-3512

janelle@clalegal.com